### UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:

Thomas W. Argiris,

Case No. 19-36018

Chapter 13

Debtor(s)

Judge Jacqueline P. Cox

#### **NOTICE OF MOTION**

TO: Thomas W. Argiris, 4131 N. Parkside Ave., Chicago, IL 60634

The Huntington National Bank, P.O.Box 89424, Cleveland, OH 44101-8539

Michele Lynn Boggs, Bankruptcy Specialist, The Huntington National Bank, P.O.Box 89424, Cleveland, OH 44101-8539

See attached list

PLEASE TAKE NOTICE that on **July 13, 2020 at 9:30 a.m.**, I will appear before the **Honorable Judge Cox**, or any judge sitting in that judge's place, and present the motion to **object to claim 1-1**, a copy of which is attached.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at <a href="https://www.CourtSolutions.com">www.CourtSolutions.com</a> or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before the date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without hearing.

/s/ Veronica D. Joyner, Esq.

JOYNER LAW OFFICE 120 South State Street Suite 200 Chicago, IL 60603 (312) 332-9001

#### **CERTIFICATE OF SERVICE**

I, Veronica D. Joyner, certify, under penalty of perjury under the laws of the United States of America, that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 11,2020 at 4:30 p.m.

Arnold Scott Harris Attorneys at Law 222 Merchandise Mart Plaza, Ste. 19 Chicago, IL 60654

Capital One Auto Finance P.O. Box 60511 City of Industry, CA 91715

Capital One Bank P.O. Box 6492 Carol Stream, IL 60197

City of Chicago - Adm Hearings P.O. Box 71429 Chicago, IL 60694

Codilis & Assoicates 15W030 North Frontage Rd Suite 100 Burr Ridge, IL 60527

Fifth Third Bank P.O. Box 740789 Cincinnati, OH 45274

Roydon Manor Condo Association 4131 N. Keeler Chicago, IL 60641

# IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:

Case No. 19-36018

Thomas W. Argiris,

Chapter 13

DEBTOR.

Judge Jacqueline P. Cox

## Objection to Claim 1-1 of The Huntington National Bank

Now comes Thomas W. Argiris, by and through Debtor's attorney, Joyner Law Office and moves this Honorable Court for entry of an Order Objecting to Claim 1-1 of The Huntington National Bank, and in support thereof respectfully represents as follows:

- On December 22, 2019, Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization.
- 2. That this case was confirmed on February 11, 2020.
- 3. That Debtor has not converted this Chapter 13 case from a Chapter 7 case.
- 4. That Debtor's confirmed plan calls for 100% distribution to unsecured creditors.
- 5. That on January 20, 2020, Huntington National Bank, file a proof of claim for \$19,895.88. In 2005, Debtor bought a 2005 Four Winds Five Thousand. Debtor made payments for a few years and decided to return the vehicle. The vehicle was auctioned off, reducing the amount of money Debtor owed. Huntington National Bank, then Citizens Bank, asked for the difference to fully close the case. Debtor paid said amount. In 2019, Debtor received notice that the bank sent a motion to garnish his wages, which was not granted because Debtor paid an additional amount to close his account. Huntington National Bank has not contacted Debtor since.

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WHEREFORE, Debtor, Thomas W. Argiris, respectfully prays this Court enter an order disallowing Claim 1-1 of The Huntington National Bank, and for such other and further relief as this Court deems fair and just.

RESPECTFULLY SUBMITTED:

/s/ Veronica Joyner Attorney for Debtor

Veronica D. Joyner #6239246 Joyner Law Office 120 South State Street Suite 200 Chicago, IL 60603 312-332-9001